

UNITED STATES OF AMERICA  
Before The  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2000)

Docket No. R2000-1

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS: CHRIS F. CAMPBELL (OCA/USPS-T29-10-12)  
March 13, 2000

Pursuant to sections 26 and 27 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-1-15 dated January 24, 2000, are hereby incorporated by reference.

Respectfully submitted,

  
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OCA/USPS-T29-10. Please refer to USPS-LR-I-160, Section C, page 1 and your workpaper IV.

- (a) Does the term "separation" refer to caller number as you use the term in workpaper IV? If not, please explain this term.
- (b) How many pieces of mail are represented by the 2,460 callers and the 5,995 separations?
- (c) Do any classes other than First-Class use caller service? Please explain fully.
- (d) Please provide the total volume of caller service mail for BY 1998 through the test year after rates.

OCA/USPS-29-11. Please refer to your response to interrogatory OCA/USPS-T29-9, Scenario 1. If a QBRM piece were routed to an OCR,

- (a) what are the possible depths of sort that piece might receive?
- (b) would that piece *always* be routed from the OCR to an outgoing primary BCS?
- (c) would that piece *always* receive "one extra processing step"?
- (d) Please provide downflow densities for such a piece.
- (e) What proportion of QBRM pieces are "not isolated during the outgoing facing and cancellation operation" for any reason?
- (f) What proportion of QBRM pieces that are "not isolated during the outgoing facing and cancellation operation" have a FIM obscured by a stamp?
- (g) What proportion of BRM pieces are "not isolated during the outgoing facing and cancellation operation" for any reason?

- (h) What proportion of BRM pieces that are "not isolated during the outgoing facing and cancellation operation" have a FIM obscured by a stamp?
- (i) What proportion of CRM pieces are "not isolated during the outgoing facing and cancellation operation" for any reason?
- (j) What proportion of CRM pieces that are "not isolated during the outgoing facing and cancellation operation" have a FIM obscured by a stamp?
- (k) If you are unable to find data responsive to this interrogatory, please explain why the Postal Service does not collect the data.

OCA/USPS-29-12. Please refer to your response to interrogatory OCA/USPS-T29-9, Scenario 2. Please describe in more detail the procedures associated with providing a credit or refund. In particular,

- (a) Must a recipient of BRM request a credit or refund in order to receive one?
- (b) May recipients of BRM place a standing order for a credit or refund?
- (c) What proportion of BRM deliveries involves a credit or refund?
- (d) What proportion of QBRM deliveries involves a credit or refund?
- (e) In calculating a credit or refund, are the number of and amount of postage on BRM pieces counted individually? If not, please describe the calculation procedure.
- (f) Does the Postal Service charge a fee for calculating a credit or refund? If not, why not?

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

  
Stephanie S. Wallace

Washington, D.C. 20268-0001  
March 13, 2000